

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JENNIFER VANDERSTOK, et al.,

Plaintiffs,

**BLACKHAWK MANUFACTURING
GROUP INC. d/b/a 80 Percent Arms,**

Intervenor-Plaintiff,

**DEFENSE DISTRIBUTED, and
THE SECOND AMENDMENT
FOUNDATION, INC.**

Intervenors-Plaintiffs,

V.

**MERRICK GARLAND, in his Official
Capacity as Attorney General of the
United States, et al.,**

Defendants.

Civil Action No. 4:22-cv-00691-O

**DEFENSE DISTRIBUTED AND THE
SECOND AMENDMENT FOUNDATION, INC.'S
MOTION FOR A PRELIMINARY INJUNCTION**

Defense Distributed and the Second Amendment Foundation, Inc. (“SAF”) move for a preliminary injunction that parallels the preliminary injunctions already ordered with respect to Plaintiff Tactical Machining, LLC, Docs. 56, 84, 91, and Intervenor-Plaintiff BlackHawk Manufacturing Group Inc. d/b/a 80 Percent Arms, Doc. 118. For Defense Distributed and SAF, the Court should issue an order—either a new injunction order or an order expanding the scope of its existing injunction—preliminarily enjoining the Defendants from enforcing the challenged redefinition of “firearm” in 27 C.F.R. §§ 478.11 and 27 C.F.R. §§ 478.11, *see* Definition of “Frame

or Receiver” and Identification of Firearms, 87 Fed. Reg. 24,652 (Apr. 26, 2022), against Defense Distributed, its customers, and SAF’s members. A brief and evidence support this motion.

The motion is opposed.

Date: January 12, 2023

Respectfully submitted,

/s/ Chad Flores

Chad Flores

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*Counsel for Defense Distributed and the Second
Amendment Foundation, Inc.*

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defense Distributed and the Second Amendment Foundation, Inc. conferred with Defendants’ counsel on December 19, 2022. Because the parties did not reach an agreement, this motion is opposed.

/s/ Chad Flores

Chad Flores